



**Jeanne M. Christensen**  
[jchristensen@wigdorlaw.com](mailto:jchristensen@wigdorlaw.com)

August 20, 2024

**VIA ECF**

The Honorable Jessica G. L. Clarke  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 11B  
New York, New York 10007

Re: Doe v. Black, Case No.: 23-cv-06418 (JGLC)

Dear Judge Clarke:

We represent Plaintiff in the above-captioned action. We write in connection with Plaintiff's motion for leave to amend the Complaint, which the Court indicated must be filed today. Dkt. No. 89.<sup>1</sup> As is customary to avoid unnecessary motion practice, on August 19, 2024, we sent a copy of the proposed first amended complaint ("FAC") with redlines to Defendant's counsel, asking if they consented to the FAC and Plaintiff's request for leave to amend. In response, counsel for Defendant responded that, *inter alia*, "we will oppose your motion to amend," and we "insist that you file the draft pleading under seal." In connection with filing the redlined copy of the proposed FAC, in her email response Ms. Estrich threatened the undersigned and other lawyers at Wigdor LLP with sanctions and said that she would report us for purported disciplinary violations.

We strongly disagree that the motion for leave to amend and the FAC should be filed under seal but solely on the grounds of Defendant's counsel request and associated threats, in accordance with the Court's Individual Rules, we will file the motion and the proposed FAC under seal. Pursuant to Your Honor's rules, Defendant has three business days to submit his motion in support of sealing to the Court.

We thank the Court for its time and attention to this matter.

---

<sup>1</sup> In the Order, the Court directed that: "It is hereby ordered that Plaintiff file her motion for leave to amend pursuant to Federal Rule of Civil Procedure 15(a)(2) by August 20, 2024. If Defendant plans to oppose the motion, such opposition is due September 3, 2024. Any reply by Plaintiff is due September 10, 2024."



Hon. Jessica G. L. Clarke

August 20, 2024

Page 2

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeanne Christensen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeanne M. Christensen

cc: All counsel of record (*via* ECF)